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10 **DISTRICT COURT**

11 **CLARK COUNTY, NEVADA**

12 SUSAN HOY as Special Administrator of the
ESTATE OF A.D.J., a male minor (November 17,
13 2003 - April 25, 2017), and SUSAN HOY as
Guardian Ad Litem of A.B.J., a female minor,
14 (December 21, 2005), DIJONAY THOMAS,
individually and as heir to A.D.J.,

15 Plaintiffs,

16 v.

17 PAUL D. JONES, individually; CAROLE
FALCONE, individually and in her official
18 capacity; PAULA HAMMACK, individually and
in her official capacity; CLARK COUNTY
19 DEPARTMENT OF FAMILY SERVICES;
COUNTY OF CLARK, a political subdivision of
20 the State of Nevada; DOES I-X, individuals; and
ROE CORPORATIONS I-X; DOE CLARK
21 COUNTY DEPARTMENT OF FAMILY
SERVICES EMPLOYEES XI-XXX; individually
22 and in their official capacities,

23 Defendants.

CASE NO: 2:18-cv-01403-RFB-GWF

**STIPULATION AND
[PROPOSED] ORDER
DISMISSING ALL CLAIMS AGAINST
DEFENDANT CLARK COUNTY
DEPARTMENT OF FAMILY SERVICES
(ONLY) WITH PREJUDICE AND TO
ALLOW PLAINTIFFS TO FILE AN
AMENDED COMPLAINT**

24 Plaintiffs SUSAN HOY as Special Administrator of the ESTATE OF A.D.J., and SUSAN
25 HOY as Guardian Ad Litem of A.B.J., and DIJONAY THOMAS, by and through their counsel of
26 record, MARJORIE HAUF, ESQ. and MELANIE L. THOMAS, ESQ., of the law firm of GANZ &
27 HAUF and Defendant CLARK COUNTY DEPARTMENT OF FAMILY SERVICES, by and through
28 its counsel of record, FELICIA GALATI, ESQ. of the law firm of OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI, hereby stipulate to dismiss all claims against Defendant CLARK



COUNTY DEPARTMENT OF FAMILY SERVICES (only), in the above-entitled matter, with prejudice, with each party to bear their own fees and costs incurred herein.¹

The parties further stipulate to allow Plaintiffs to amend their Complaint to add additional Defendants related to the weekly rental complex where the Decedent was killed.

DATED this 14th day of November, 2018.
GANZ & HAUF

/s/ Marjorie Hauf, Esq.

MARJORIE HAUF, ESQ.
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DATED this 14th day of November, 2018.
OLSON, CANNON, GORMLEY, ANGULO
& STOBERSKI

/s/ Felicia Galati, Esq.

FELICIA GALATI, ESQ.
Nevada Bar No. 7341
9950 W. Cheyenne Ave.
Las Vegas, Nevada 89129
Attorneys for Defendants

IT IS SO ORDERED.

DATED this 26th day of November, 2018.



RICHARD F. BOULWARE, II
United States District Judge

¹ The claims against Defendants PAUL D. JONES, individually; CAROLE FALCONE, individually and in her official capacity; PAULA HAMMACK, individually and in her official capacity; COUNTY OF CLARK, a political subdivision of the State of Nevada; DOES I-X, individuals; and ROE CORPORATIONS I-X; DOE CLARK COUNTY DEPARTMENT OF FAMILY SERVICES EMPLOYEES XI-XXX; individually and in their official capacities, will remain and are not subject to this Stipulation.